

Our File No.: 53575

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JM5630

UNITED STATES
BANKRUPTCY COURT FOR
THE DISTRICT OF NEW
JERSEY

IN RE:

ASSUNCAO BROS., INC.

CHAPTER 11
CASE NO: 22-16159(CMG)
HEARING DATE: 1-3-2023

NOTICE OF MOTION OF
SANTANDER CONSUMER
USA INC. DBA CHRYSLER
CAPITAL TO MODIFY THE
AUTOMATIC STAY

To:

Assuncao Bros., Inc.
29 Wood Avenue
Edison, NJ 08820
Debtor

Joseph A. Caneco, Esq.
101 Park Avenue, 17th Floor
New York, NY 10178
Attorney for the debtor

Joseph J. DiPasquale, Esq.
49 Market Street
Morristown, NJ 07960
Attorney for the debtor

Scott S. Rever
110 Allen Road
Suite 304
Basking Ridge, NJ 07920
Trustee

CONTINUED

U.S. Trustee, US Dept of Justice
Office of the US Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

CREDITORS:

American Express National Bank c/o Doyle & Hoefs, LLC 2043 Springwood Road York, PA 17403 Attn: Michael J. Hoefs, Esq.	Black Rock Enterprises, LLC 1316 Englishtown Road Old Bridge, NJ 08857
Diamond Sand and Gravel, Inc. c/o McElroy, Deutsch, Mulvaney 1300 Mount Kemble Avenue Morristown, NJ 07962-2017 Attn: Michael R. Morano	Essex County Sheriff's Office Special Services 50 West Market Street, Room 201 Attn: James Spango PR 00710-2000
Liberty Building Products 193 Christie Street Newark, NJ 07101	NGM Insurance Company c/o McElroy, Deutsch, Mulvaney, et al 1300 Mount Kemble Avenue Morristown, NJ 07962-2017 Attn: Adam R. Schwartz
Pennsylvania Jersey Concrete 2819 Fire Road Egg Harbor Township, NJ 08234	Precast Systems, Inc. 57 Sharon Station Road Allentown, NJ 08501
Ramon Asphalt Corp. 32 O'Brien Street Kearny, NJ 07032	Shore Systems Group, LLC P.O. Box 188 Clarksburg, NJ 08510
Stavola Flemington Asphalt P.O. Box 482 Red Bank, NJ 07701	Tiffany Electric 5 Eastmans Road Parsippany, NJ 07054
Union Local – 472 Laborers 700 Raymond Blvd. Newark, NJ 07105	Zuccaro Inc. 64 Commerce Street Garfield, NJ 07026
County Concrete Corp. P.O. Box F Kenvil, NJ 07847	JM Ahle, Inc. 190 William Street, Suite 2D South River, NJ 08882

Operating Engineers Local 825 65 Springfield Avenue Springfield, NJ 07081		Ralph Clayton & Sons P.O. Box 3015 Lakewood, NJ 08701
Statewide Striping Corp. 499 Pomeroy Road Parsippany, NJ 07054		Union Carpenters 91 Fieldcrest Avenue Edison, NJ 08837

John R. Morton, Jr., Esquire, attorney for Santander Consumer USA Inc. dba Chrysler Capital, has filed papers with the Court for relief from the automatic stay to permit Santander Consumer USA Inc. dba Chrysler Capital to repossess and sell the motor vehicle(s) described in the attached pleadings. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult with one.** If you do not want the Court to grant the relief sought, or if you want the Court to consider your views on the motion, then no later than seven (7) days before the hearing date, you or your attorney must:

File with the Court a written request for a hearing (or, if the Court requires a written response, an answer, explaining your position) at:

United States Bankruptcy Court
402 E. State Street
Trenton, NJ 08608

If you mail your (request) (response) to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

John R. Morton, Jr., Esquire
110 Marter Avenue, Suite 301
Moorestown, NJ 08057

TAKE FURTHER NOTICE that the facts movant relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion, and TAKE FURTHER NOTICE that oral argument is hereby not requested.

Attend the hearing scheduled to be held on January 3, 2023 at 10 a.m. in Courtroom #3, United States Bankruptcy Court, 402 E. State Street, Trenton, New Jersey 08608.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order.

Date: 12-9-2022

/s/ John R. Morton, Jr., Esquire
John R. Morton, Jr., Esquire
Attorney for Santander Consumer USA Inc. dba
Chrysler Capital